

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

PHILIP A. BROWN and,
NANCY LEE BROWN

Debtor(s)

TOYOTA MOTOR CREDIT CORPORATION,

Plaintiff(s)/Movant(s)

vs.

PHILIP A. BROWN,
NANCY LEE BROWN,
MARLEE BROWN, and
JACK N. ZAHAROPOULOS, Trustee

Defendant(s)/Respondent(s)

CHAPTER 13

CASE NO. 1 - 19 .bk- 05295-HWV

ADVERSARY NO. - ap-
(if applicable)

Nature of Proceeding: Hearing re:

Motion for Relief from Automatic Stay

Document #: 54, 55

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Parties are currently in the process of resolving the Motion for Relief from Stay filed by Toyota Motor Credit Corporation and agree to request a continuance from this Honorable Court of the hearing currently scheduled for Tuesday, February 1, 2022

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 31, 2022

/s/ Keri P. Ebeck

Attorney for Toyota Motor Credit Corporation

Name: Keri P. Ebeck, Esq.

Phone Number: (412) 456-8112

¹ No alterations or interlineations of this document are permitted.